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Attorneys for Defendants
Choice Hotels International, Inc.
and Choice Hotels Owners Council

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAI SAI BABA LLC, et al.

Plaintiffs,

v.

CHOICE HOTELS INTERNATIONAL, INC.
and CHOICE HOTELS OWNERS COUNCIL,

Defendants.

Civil Action No. 5:20-cv-02823-JFL

STATUS REPORT

Pursuant to the Court’s March 19, 2021 Order (Dkt. No. 14), Defendants Choice Hotels International, Inc. (“Choice”) and Choice Hotels Owners Council (together with Choice, “Defendants”), by and through their undersigned counsel, respectfully submit this Status Report.

On March 19, 2021, the Court granted Defendants’ Motion to Compel Arbitration, directed Plaintiffs to individually submit all of their claims against Defendants to binding arbitration pursuant to the terms of their franchise agreements, and stayed the action pending the outcome of the arbitrations (Dkt. No. 14).

To this date, no Plaintiff has initiated arbitration proceedings. There is currently one arbitration pending between any Plaintiff and any Defendant—an arbitration commenced by Choice against DIP Hospitality, LLC, seeking damages for, *inter alia*, failing to pay franchise fees and related fees. After Choice commenced this arbitration on April 29, 2021, which originally involved claims unrelated to the allegations in Plaintiffs' Amended Complaint here, DIP Hospitality and other affiliated individuals filed an answering statement with counterclaims against Choice on May 19, 2021. The arbitration panel has not yet issued a schedule in the arbitration between Choice and DIP Hospitality.

To this date, Plaintiffs have not served any other arbitration demands on Defendants.

Dated: June 1, 2021

Respectfully submitted,

s/ Stephen A. Loney, Jr.
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